

# EXHIBIT 1

THE HONORABLE THOMAS S. ZILLY

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUNTERS CAPITAL, LLC, a Washington  
limited liability company, et al., on behalf of  
themselves and others similarly situated,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

Case No. 2:20-cv-00983 TSZ

PLAINTIFF HUNTERS CAPITAL, LLC'S  
FOURTH SET OF REQUESTS FOR  
PRODUCTION TO DEFENDANT CITY OF  
SEATTLE

Pursuant to Fed. R. Civ. P. 26 and 34, Plaintiff HUNTERS CAPITAL, LLC, a Washington limited liability company, by its undersigned attorneys, hereby propounds the following requests for production to Defendant, City of Seattle ("Defendant" or the "City"). Defendant shall respond to these requests for production within thirty (30) days of service. Responses and produced documents are to be served to Calfo Eakes LLP, 1301 Second Avenue, Suite 2800, Seattle, WA 98101. The requests below are continuing and impose upon Defendant the obligations stated in Fed. R. Civ. P. 26.

- 1 16. “SPD” refers the Seattle Police Department, a division of Defendant.
- 2 17. “SFD” refers the Seattle Fire Department, a division of Defendant.
- 3 18. “SDOT” refers the Seattle Department of Transportation, a division of Defendant.
- 4 19. “SPU” refers to Seattle Public Utilities, a division of Defendant.
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6 **III. REQUESTS FOR PRODUCTION**

7 **REQUEST FOR PRODUCTION NO. 45:**

8 All documents from June 2020 to December 2020 regarding the safety or condition of, and  
9 encampments in, or gatherings of protestors in Cal Anderson Park and any plan to empty the park  
10 and/or adjacent area of encampments or gatherings of protestors. This includes, but is not limited  
11 to, all documents related to the “new approach” and Cal Anderson Park discussed by Casey  
12 Sixkiller in his October 12, 2021 deposition at pages 208-212.

13 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 46:**

17 All documents regarding the creation, construction, existence of, necessity of, and/or  
18 removal of the temporary barrier that was in place near and around the East Precinct from July  
19 2020 to approximately April 2021.

20 **RESPONSE:**

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23 **REQUEST FOR PRODUCTION NO. 47:**

24 All documents regarding complaints of excessive noise in the CHOP Zone from July 2020  
25 through the present in the CHOP zone due to the activities related to or involving encampments in

Cal Anderson Park, protests or demonstrations in the CHOP zone, and/or or any enforcement actions initiated by the City regarding those encampments, protests, or demonstrations.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 48:**

All documents dated at any time from June 2020 the present discussing any impacts or effects CHOP had, or continues to have, on any part of the CHOP Zone.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 49:**

All documents related to any protests, crowds, or large gatherings of people that occurred or originated in, or passed through, the CHOP Zone at any time between July 1, 2020, the present. This includes, but is not limited to, any of the “rolling protests” described by Sam Zimbabwe in his October 28, 2021, deposition at 172-175, all documents regarding applications for or permits granted (or denied) for any marches through the CHOP zone between July 1, 2020, and the present, and any enforcement action by the City to prevent unpermitted marches from occurring for that same area and same time.

**RESPONSE:**

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**REQUEST FOR PRODUCTION NO. 50:**

All documents related to any temporary blockage of City streets by protesters, demonstrators, and/or police in the CHOP Zone from July 1, 2020, to the present and police or other reports of vandalism and property damage done by protesters in the CHOP Zone during the same time period.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 51:**

All documents related to, describing, summarizing, or analyzing crimes reported or committed in (1) the CHOP Zone and (2) SPD Beat E2 between July 1, 2020, and the present, and any documents showing a comparison of the numbers of crimes reported from 2019 – 2020, and 2020 – 2021, organized by category or type of crime committed (for example only, assault, aggravated assault, battery, robbery, burglary, damage to property, sexual assault, rape, homicide).

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 52:**

All documents related to the analysis discussed by Chief Harold Scoggins in his September 14, 2021, deposition at pages 81-86.

**RESPONSE:**